

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

R. Lance Flores, and
Vicki Clarkson,

Plaintiffs,

v.

Scott Anthony Koster, et al.

Defendants.

CIVIL ACTION

Nº 3:11-cv-00726-M -BH

NOTICE OF DISMISSAL

PLAINTIFF'S NOTICE OF TEMPORARY DISMISSAL/REMOVAL WITHOUT PREJUDICE

Plaintiffs file their notice of dismissal under Federal Rule of Civil Procedure 41(a)(1)(i).

1. Plaintiffs are R. Lance Flores and Vicki Clarkson.
2. Defendants temporary removed/dismissed from suit without prejudice are:
 1. Brandon Colker,
 2. Gregory Botolino,
 3. Success Bullion,
 4. Vladimir Pierre Louis
 5. Trask and Affiliates Ltd. (the “dismissal defendants” or “defendants”).
3. On March 19, 2012, Plaintiffs sued aforementioned defendants. (doc. 36)
4. Defendants have not been served. Defendant have not been served because their secreting of domiciliary and business locations in order to avoid service and their discovery of underlying transactions in this lawsuit.
5. RICO Defendants John Childs, Steven Woods, Mark Gelazela, Scott Koster, Kerim Emre and Richard D. Hall, having communication information for, and location knowledge of the defendants identified above (¶¶ 2.1-2.4), have refused to comply with

Plaintiffs' Request for Initial Disclosure (Pla. Ex. 261, attached), specifically in this instance, information relating to the contact and address information of the dismissal defendants.

6. Plaintiffs' believe the defendants will be reinstated only after initiation of discovery and orders to compel their disclosure by the RICO Defendants.
7. This case is not a class action.
8. A receiver has not been appointed in this action.
9. This case is not governed by any federal statute that requires an order of the court for dismissal of the case.
10. Plaintiffs have not dismissed an action based on or including the same claims as those presented in this suit.
11. This dismissal is without prejudice.
12. NOTICE TO CLERK IS GIVEN HEREBY for the removal of subject Nominal Defendants.

Respectfully submitted on Tuesday, July 17, 2012:

s/


R. LANCE FLORES
Lead Attorney

3314 Pleasant Drive
Dallas, Texas 75227 USA
Tel. (Dallas): +1 (214) 272-0349

ECF & Case Management E-mail:
LF_legaldept@MockingbirdFilms.com

Attorney for the Plaintiff

s/


VICKI CLARKSON

2416 - 36 Street SW
Calgary, AB T3E 2Z5

Tel. (Calgary): +1 403-244-9980
Tel. (Fax): +1 (403) 246-3331
ECF & Case Management E-mail:
VC_LegalDept@MockingbirdFilms.com

Attorney for the Plaintiff

CERTIFICATE OF SERVICE

On Tuesday, July 17, 2011, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or prose parties of record electronically or by another manner authorized by Federal rule of Civil Procedure 5 (b)(2).

s/

R. LANCE FLORES